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June 30, 2022

**Via ECF**

The Honorable Sarah Netburn  
United States Magistrate Judge  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, New York 10007

Re: *Roche Cyrulnik Freedman LLP v. Jason Cyrulnik*, No. 1:21-cv-1746 (S.D.N.Y.)

Dear Judge Netburn:

We represent Plaintiff and Counterclaim-Defendants (the “RF Parties”) in this matter and write in response to Cyrulnik’s June 28, 2022 letter to Judge Koeltl seeking temporary sealed status of his letter motion to you. (*See* Dkt. No. 151.)

The RF Parties understood the Court’s order at Dkt. No. 153 to have sealed these filings subject to further review. But as Defendant filed his letter pursuant to Judge Koeltl’s Individual Practices VI.A.2, which require the RF Parties to file a responsive letter, the RF Parties have filed this response in an abundance of caution.

In that vein, the RF Parties respectfully request that the Court seal the information Defendant sought to seal temporarily. That information concerns confidential agreements between the RF Parties and their clients, including specific information about client fee arrangements and relationships. Judge Koeltl has previously granted the parties’ requests to seal substantially similar information. (*See, e.g.*, Dkt. Nos. 68, 99, 111.)

Thank you for your consideration.

Respectfully,



Sean Hecker

cc: Counsel of Record (via ECF)